

**IN THE UNITED STATES DISTRICT FOR
THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

JEROME SCHMIDT

NO. 1:18-CV-88-DAE

Plaintiff

vs.

UNITED STATES OF AMERICA,

Defendant

PLAINTIFF'S DEPOSITION DESIGNATION

Under the Court's Order Setting Non-Jury Bench Trial & Related Deadlines (April 12, 2019) (ECF No. 57), the Plaintiff files the following deposition designations.

First, the United States represented that it intends to call its designated expert witnesses live. Plaintiffs intend to illicit favorable testimony via cross examination. To the extent that the United States does not call those witnesses, Plaintiffs intend to play portions of their video depositions for the Court. These designated expert witnesses include **Christopher M. Loftus** and **Julio Chalela**.

Second, Plaintiff designates the video deposition testimony of Government employee **Edward Saylor**. *See* Appendix A.

Respectfully Submitted,

/s/ Jamal Alsaffar

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CERTIFICATE OF SERVICE

By my signature above, I certify that a copy of Plaintiff's Deposition Designation has been sent to the following on November 11, 2019 via the Court's CM/ECF notice system.

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APPENDIX A: EDWARD SAYLOR DESIGNATION

Plaintiff will play all or part of the following video deposition excerpts from the deposition of Edward Saylor:

- 8:18-21
- 9:1-3
- 9:8-11
- 10:19-25
- 11:1-6
- 11:25-12:21
- 14:1-15:1
- 15:15-17
- 17:15-18:13
- 19:2-20:15
- 22:1-25
- 23:1-7
- 25:9-27:10
- 27:14-28:1
- 28:7-13
- 34:9-18
- 35:14-36:2
- 36:19-37:11
- 45:14-46:9
- 47:11-17
- 48:7-19
- 48:25-50:4
- 56:1-7
- 56:21-25